



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.ohio.gov

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Huron County  
Western Reserve Local Schools  
**Notice of Violation (NOV)**

June 30, 2010

Mr. Rodge Wilson, Superintendent  
Western Reserve Local School District  
3765 U.S. Route 20 East  
Collins, Ohio 44826

Dear Mr. Wilson:

On June 22, 2010, I conducted an inspection of the wastewater treatment plant serving the Western Reserve Local Schools. Western Reserve Local Schools is currently operating under National Pollutant Discharge Elimination System Permit (NPDES) No. 2PT00023\*BD. At the time of my inspection the plant was operating. No samples were taken to verify compliance with permit limits. Our observations and recommendations are as follows:

1. The wastewater is directed through a trash trap, raw wastewater pump station and flow equalization basin prior to entering the aeration tanks.
2. A 5-gallon bucket labeled Calcium Hypochlorite tablets was on the equalization tank. However, the contents of the bucket did not appear to be calcium hypchlorite. Please make sure that buckets of chemicals used at the plant are properly labeled to match the contents of the bucket. (See Enclosed Photos)
3. The contents of the aeration tank appeared light brown. The rate of aeration appeared adequate.
4. A review of the operation sheets indicated that the diffusers were offline for maintenance from 6/1/2010 to 6/15/2010. In the future, we suggest that routine maintenance activities be completed as quickly as possible so that degradation of effluent quality and the potential for effluent limit violations is minimized.
5. The water in the clarifiers was turbid and had solids floating on top. The water flowing over the clarifier weir appeared to have light solids and was slightly turbid. (See Enclosed Photo)
6. The west sand filter was online and appeared to have recently been raked clean. The east sand filter was offline, there was significant sludge build up on the filter and it was ponded with water. In order to speed the drying time you may want to consider pumping the water on the ponded filter back to the head of the plant. (See Enclosed Photos)

Mr. Rodge Wilson  
June 30, 2010  
Page Two

7. A review of the discharge monitoring report (DMR) since March 2010 shows continued effluent limit violations of the Nitrogen Ammonia (NH<sub>3</sub>), and pH parameters of your permit. A copy of the violations is enclosed. **The facility remains in significant non-compliance and in violation of the NPDES schedule of compliance which required the plant to attain compliance with the final effluent limits no later than 15 months after the effective date of the permit.** If these violations continue to occur and if satisfactory progress is not made to meet permit limits, it may be necessary to initiate enforcement action to achieve compliance. Please be aware that your certified operator receives a monthly Preliminary Compliance Report (PCR) email notifying them of the violations. If you would like Ohio EPA to forward a copy of these reports to you please provide us an email address with your written response to this letter.
  
8. A one-page monthly operations sheet that is maintained by your operator was contained in the control box. In order to comply with record keeping requirements of OAC 3745-7-09 there should be a minimum of the previous three months of operation and maintenance records available for inspection by Ohio EPA at all times. In addition, the rule requires that your operator of record indicate dates and times of arrival and departure on the operations sheet. In order to come into compliance with the record keeping requirements we request that the operations sheets be updated to indicate arrival and departure times and that the previous three months of operations sheets start being maintained at the plant.

Please be aware that we have not yet received the requested written response to our April 2010 inspection letter which was required to have been submitted within fourteen (14) days of receiving it. Therefore, we request that you submit a written response to both this and the April 2010 inspection letter by July 21, 2010. The signed and dated written response should indicate how the non-compliance issues will be addressed and what operation improvements can/will be made to attain compliance with permit limits. Failure to submit the response within the specified time frame may result in formal enforcement action by this agency. If you have any questions regarding the inspection or this letter, please contact me at (419) 373-3003 or via email at [andrew.gall@epa.state.oh.us](mailto:andrew.gall@epa.state.oh.us).

Sincerely,



Andrew Y. Gall  
Environmental Specialist II  
Division of Surface Water

/cs

Enclosures

pc: Mr. John Charville (w/enc.)  
Eastwood Environmental (w/enc.)  
Huron County Health Department  
←NWDO-DSW-File w/enclosure→

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION  
WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2PT 00023

Facility Name Western Reserve Local Schools Expiration Date 2/2012  
 Facility Address 3765 US Route 20 East Date 6/22 Time 1:15 am (pm)  
 City Collins County Huron Township Townsend  
 Name and Address of Owner SAME  
 Person Contacted \_\_\_\_\_ Owner Phone \_\_\_\_\_

Flow: Design \_\_\_\_\_ GPD Present \_\_\_\_\_ GPD (metered - estimated)

Trib. Pop. \_\_\_\_\_ (actual - estimated) Weather at time of inspection: Temp 80° Sunny

OEPA Personnel Andrew Gall District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear	X	None		Colorless
1	Mild					1	
2	Moderate	X	Light Solids	X	Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

2. Effect of effluent on Receiving Stream Name: \_\_\_\_\_

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear		None		Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has \_\_\_\_\_ excellent \_\_\_\_\_ good X fair \_\_\_\_\_ poor operation  
 b. Plant has \_\_\_\_\_ excellent \_\_\_\_\_ good X fair \_\_\_\_\_ poor maintenance  
 c. Sand filters have \_\_\_\_\_ excellent \_\_\_\_\_ good \_\_\_\_\_ fair X poor maintenance

d. Not operating at expected efficiency due to:

- (1) \_\_\_\_\_ hydraulic overload  
 (2) \_\_\_\_\_ organic/solids overload  
 (3) \_\_\_\_\_ personnel inefficiency  
 (4) \_\_\_\_\_ equipment failure  
 (5) \_\_\_\_\_ wastes  
 (6) \_\_\_\_\_

Disinfection: (Required May 1 thru Oct.31.)

IN <u>X</u>	OUT _____	} Tablets <u>IN</u>
<u>X</u>	_____ Chlorination Tablets	
_____	_____ Dechlorination Tablets	
_____	_____ U.V.	

Yes No

4. X Compliance with NPDES Permit

Periodic Violations Y N Parameters: \_\_\_\_\_

Chronic Violations X \_\_\_\_\_ pH, NH<sub>3</sub>, Fecal Coliform

5. X Adequate plant safety Fenced

6. \_\_\_\_\_ Operation and Maintenance Service Name Eastwood E

Frequency of Visits 1/week

Diffusers down from 6/11 to 6/15

*6/22  
Did nothing  
in sand filter  
or sludge  
build up  
in clarifier*

*OPS ??*

*- At plant 6/1, 6/2  
6/8, 6/15 & 6/22  
- no time out*

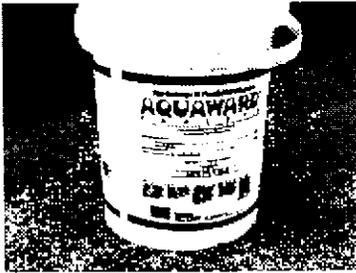
Facility Name: Western Reserve Local Schools

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency:
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	Very Foamy and Light Grey
	1	Flow Equalization	Adding Calcium Hypochlorite to EQ tank
Aeration Equipment		Plant Timer ___Y___N	Cycle Time:
		Motor/ Blower Unit	
Secondary Treatment	2	Aeration Tank	Color: Light Brown and Grey Adequate Aeration: Y <input checked="" type="checkbox"/> N ___
Final Settling	1	Clarifier	Solids and Sludge Buildup floats on top Slight Odor, Solids and Algae in water
		Sludge Return	In <input checked="" type="checkbox"/> Out <input checked="" type="checkbox"/> brown returning water with light solids
		Surface Skimmer	In <input checked="" type="checkbox"/> Out <input checked="" type="checkbox"/>
	1	Fixed Media Clarifier	Water appeared to have light solids
Tertiary Treatment	2	Surface Sand Filter	East filter plugged and ponded
		Polishing Pond	
		Other	
Disinfection	1	Contact Tank	
	1	Chlorine Tube Feeder	Tablets in feeder
	1	Dechlorination Tube Feeder	" " "
		Ultraviolet (UV)	
Flow Metering	1	Elapsed Pump Time	
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
Sludge Handling	1	Aerated Storage Tank	Sludge in tank, being aerate
		Sludge Drying Bed	
Sludge Disposal		Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment	1	Post Aeration	Online
		Spray Irrigation	
		Other	

Get New Data

- Limit Violations - Western Reserve Local Schools

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PT00023*BD	March 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.835	3/1/2010
2PT00023*BD	March 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	6.76	3/9/2010
2PT00023*BD	March 2010	001	00400	pH	1D Conc	6.5	6.2	3/9/2010
2PT00023*BD	March 2010	001	00400	pH	1D Conc	6.5	5.6	3/16/2010
2PT00023*BD	March 2010	001	00400	pH	1D Conc	6.5	5.7	3/23/2010
2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	5.5	4/6/2010
2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	6.	4/13/2010
2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	5.4	4/21/2010
2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	6.	4/27/2010
2PT00023*BD	May 2010	001	31616	Fecal Coliform	1D Conc	2000	2700.	5/10/2010
2PT00023*BD	May 2010	001	00400	pH	1D Conc	6.5	6.2	5/10/2010
2PT00023*BD	May 2010	001	00400	pH	1D Conc	6.5	5.7	5/18/2010
2PT00023*BD	May 2010	001	00400	pH	1D Conc	6.5	5.9	5/24/2010



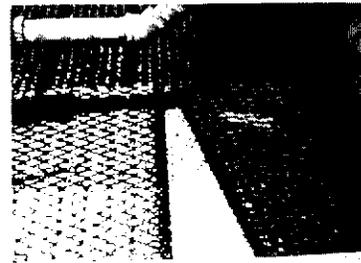
Western Reserve Local School 06.22.2010  
Biosolids  
Photo Taken By: Andrew Gall, Ohio EPA NWDD-DSW



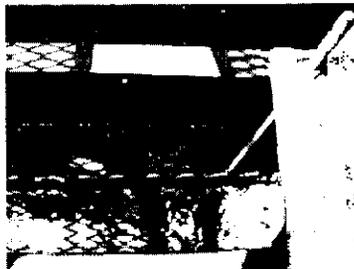
Western Reserve Local School 06.22.2010  
East sand filter  
Photo Taken By: Andrew Gall, Ohio EPA NWDD-DSW



Western Reserve Local School 06.22.2010  
West sand filter  
Photo Taken By: Andrew Gall, Ohio EPA NWDD-DSW



Western Reserve Local School 06.22.2010  
Final Clarifier  
Photo Taken By: Andrew Gall, Ohio EPA NWDD-DSW



Western Reserve Local School 06.22.2010  
West Well, Final Clarifier  
Photo Taken By: Andrew Gall, Ohio EPA, NWDD-DSW